

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 23 B 00235
Nashonna Turner,)	Honorable Judge: A. Benjamin Goldgar
Debtor)	CHAPTER 7
)	
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Nashonna Turner,)	
)	
Plaintiff)	
)	
v.)	ADV. NO. 23 AP 00015
)	
U.S. Department of Education,)	
)	
)	
)	
Defendant)	

NOTICE OF MOTION

Please take notice that on **May 24, 2024, at 11:15 a.m.**, I will appear before the Honorable Chief Judge A. Benjamin Goldgar, or any judge sitting in that judge's place, **either in courtroom 642** of the United States Bankruptcy Court, Northern District of Illinois, located in the Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, **or electronically as described below**, and present the **Agreed Motion to Enter Agreed Judgment Order**, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and password. The meeting ID for this hearing is 160 817 7512 and the password is 623389. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

CERTIFICATE OF SERVICE

I, Megan Holmes,

☒ an attorney, certify

- or -

☐ a non-attorney, declare under penalty of perjury under the laws if the United States of America

that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list via regular U.S. Mail with postage prepaid from the mailbox located at 11101 S Western Ave, Chicago, IL 60643 on April 29, 2024.

TO:

U.S. Department of Education Headquarters,, Lyndon Baines Johnson (LBJ), Department of Education Building, 400 Maryland Ave, SW, Washington, DC 20202;

Secretary Of Education Miguel Cardona, 1600 Pennsylvania Avenue NW, Washington, DC 20500;

Merrick Garland, Attorney General, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington, DC 20530;

John R. Lausch, Jr, US Attorney for the Northern District of Illinois, U.S. Department of Justice , 219 South Dearborn Street, Chicago, Illinois 60604;

/s/ Megan Holmes

Attorney for Debtor

The Semrad Law Firm, LLC

11101 S Western Ave

Chicago, IL 60643

(312) 837-4019

mholmes@semradlaw.com

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AGREED MOTION FOR JUDGMENT

NOW COMES the Plaintiff, Nashonna Turner (“Plaintiff”), by and through her attorneys, The Semrad Law Firm, LLC, and moves this Honorable Court to enter the attached agreed judgement order. In so, the Plaintiff states as follows:

1. Plaintiff, Nashonna Turner, filed the above-captioned adversary proceeding with case number 23 AP 00015, pursuant to 11 U.S.C. 523(a)(8) against U.S. Department of Education to determine the dischargeability of student loan debt based on undue hardship.
2. The Plaintiff and the Department of Education entered into the attached Stipulation and Non-Opposition to Discharge (Stipulation), in which the parties stipulate that requiring

Plaintiff to repay some of the loans held by the Department of Education would impose an undue hardship on Nashonna.

3. Accordingly, with the agreement of the Department of Education, Plaintiff asks that the Honorable Court enter the proposed judgment order, declaring that certain loans held by the Department of Education are discharged under § 523(a)(8) and the Discharge Order entered in the above captioned bankruptcy case. Entry of the attached agreed judgment order will resolve this adversary proceeding.
4. Therefore, Plaintiff respectfully requests this Honorable Court enter the proposed judgment order.

WHEREFORE, the Plaintiff prays this Honorable Court for the following relief:

- A. This Honorable Court enter the attached Agreed Judgment Order; and
- B. For such other and further relief this court deems just and proper.

Respectfully Submitted,

/s/ Megan Holmes
Attorney for Debtor

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